

Via Electronic Mail

June 3, 2019

Ms. Andrea Leshak, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866

Ms. Zolymer Luna
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 Rd 165, km 1.2
Guaynabo, Puerto Rico 00968-8069

Re: **PROTECO Site in Peñuelas, Puerto Rico**

Dear Ms. Leshak and Ms. Luna:

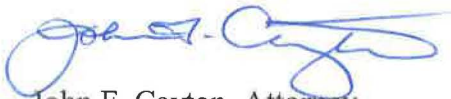
The following is submitted by Owens-Illinois, Inc. ("Owens"), One O-I Plaza, One Michael Owens Way, Perrysburg, Ohio 43551, in response to the U.S. Environmental Protection Agency's ("USEPA") March 28, 2019 Request for Information pursuant to Section 107(a) and 104(e) of CERCLA, relating to information, if any, in the possession of Respondent with respect to the PROTECO Site ("Site").

Owens has made a good faith effort to respond to the request, and has provided a response to each of the questions. Due to the fact that 12 years have passed since the glass manufacturing facility, located at Road 690 KM 1.1 in Vega Alta, Puerto Rico ("Facility") was closed, a limited amount of records were available.

Exhibits A through T, attached, contain information which may be responsive to the request.

If you have any questions regarding this response, please call me at (567) 336-2070.

Respectfully submitted,



John F. Cayton, Attorney
Owens-Illinois, Inc.
One Michael Owens Way, Plaza One
Perrysburg, OH 43551-2999

Enclosures

GENERAL OBJECTIONS:

- 1. Owens objects to the Request for Information on the grounds that it is unduly burdensome and overly broad as it seeks information for an unreasonably long period of time and seeks documents and information that is not within the possession, custody or control of Respondent and information and documents that do not directly relate to the PROTECO Site.**
- 2. Owens objects to any request by the U.S. EPA to produce any material which is subject to attorney-client privilege or other privilege, or which constitutes protected attorney-work product.**
- 3. Owens objects to any attempt by U.S. EPA to create a continuing duty for Owens to supplement its responses on the grounds that such instruction exceeds the statutory authority of CERCLA. Without waiving its objection, Respondent will voluntarily supplement its responses in the event it becomes aware of any new information or any information that demonstrates that its response was incorrect when made, though believed to be correct when made, or is no longer true.**

REQUESTS FOR INFORMATION:

Without waiving any of the foregoing General Objections, Respondent responds to the specific Requests for Information (Exhibit A) as follows:

Request No. 1:

Answer the following questions regarding the Company:

- a. State the correct legal name and mailing address for the Company;*
- b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company;*
- c. Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different; and*
- d. Identify any successor corporations, predecessor corporations, or other entities related to the Company. If the Company is or was a subsidiary or affiliate of another corporation or other entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.*

Response No. 1.:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome.

Owens is the largest manufacturer of glass containers in the world with 77 manufacturing facilities in 23 countries throughout the world, and is the leading glass container manufacturer in most of the countries where we have manufacturing facilities.

Owens, through its subsidiaries, is the successor to a business established in 1903. Over the course of its 116-year history, through mergers, acquisitions and divestitures, Owens has operated and been incorporated under many different names. Owens has also had numerous subsidiaries, divisions, operating units, and affiliates over its history. To list all of the above, as well as all registered agents, officers, and operations management personnel throughout the Company's history would be unduly burdensome.

Notwithstanding the foregoing and without waiving any of its objections, Owens is providing in Exhibit B, copies of its Form 10-K for 2014 through 2018, which include information on Owens' recent corporate structure and management.

The agent for process of service on Owens is CT Corporation.

Request No. 2:

Describe the current and past business relationship between the Company and Owens-Illinois de Puerto Rico.

Response No. 2:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Notwithstanding the foregoing and without waiving any of its objections, Owens provides the following information:

Owens-Illinois de Puerto Rico, LLC ("OIPR") operated as a glass manufacturing facility from the mid 1970's until July 2007. Prior to August 2001, OIPR was affiliated with Owens.

On or about August 2001, United Caribbean Container, Ltd, a Cayman Islands corporation, took 100% ownership of OIPR. Although Owens owned an indirect interest in United Caribbean Container, Ltd., it was not a majority nor a controlling interest.

OIPR defaulted on its mortgage, which led to a public auction of the mortgaged real estate and the Facility in December 2008. At public auction, Seagate, Inc., a wholly-owned subsidiary of Owens, acquired full ownership of the real estate, including all of the physical structures and buildings located on the land, but did not take ownership of the business as a going concern. See Deed of Judicial

Sale dated January 20, 2009 (Exhibit C). On April 9, 2009, Seagate, Inc. leased the property to O-I Caribbean Sales & Distribution, Inc. ("OICS&D"), a sales and distribution center; that lease ran through April 9, 2011. See Lease dated April 9, 2009 (Exhibit D). Seagate, Inc. continues to own the property.

Request No. 3:

State the corporate history of the Company, including all name changes and mergers. List all names under which the Company has operated and has been incorporated. For each other name, provide the following information:

- a. Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;*
- b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and*
- c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of that other company.*

Response No. 3:

See Responses to Requests Nos. 1 and 2.

Request No. 4:

Identify all changes in ownership relating to the Company from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

Response No. 4:

See Responses to Requests Nos. 1 and 2.

Request No. 5:

For each owner that is a subsidiary of another corporation identified in your answer to Request #4, above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term "ultimate corporate parent" means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.

Response No. 5:

See Response to Request No. 1.

Request No. 6:

Provide copies of the Company's authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

Response No. 6:

See Responses to Requests Nos. 1 and 2.

Request No. 7:

State the dates during which the Company owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

Response No. 7:

See Response to Request No. 2.

Request No. 8:

Indicate whether the Company has ever operated at a location other than the Facility. If yes, provide the correct names and addresses of the Company's other facilities where the Company carried out its operations.

Response No. 8:

See Response to Request No. 1.

Request No. 9:

Describe in detail the nature of the business and the operations conducted at the Facility and at any locations identified in response to Request #8, above, during the period that the Company operated there. Provide a brief description of the Company's operations at each facility, including the following:

- a. *The date such operations commenced and concluded; and*
- b. *The types of work performed at each facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each facility.*

Response No. 9:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Notwithstanding the foregoing and without waiving any of its objections, Owens provides the following information:

The Company's Vega Alta, Puerto Rico Facility, was a glass container manufacturing facility. Glass container manufacturing facilities melt raw materials such as sand, soda ash, limestone and cullet (crushed, recycled glass) in glass melting furnaces. The molten glass flows from a furnace through forehearths, passing through shears that

cut the molten glass into "gobs" which are distributed to the mold cavities in the forming machines, where the gobs are formed into various shaped bottles. The hot formed glass containers are coated on the surface with a tin solution and then they are re-heated in an annealing lehr and cooled gradually to relieve internal stresses in the formed glass container. The exterior surface of the cooled containers is then sprayed with a coating of polyethylene to reduce abrasion of the container surfaces during handling. After the cold end surface treatment, the containers are inspected and are packaged for shipment.

Request No. 10:

Describe how the Company came to possess the hazardous substances that came to be located at the Site.

Response No. 10:

USEPA's March 28, 2019 Request for Information included as Attachment D a Hazardous Waste Manifest which purportedly shows that OIPR sent 75,360 pounds of furnace repair rubble (Waste No. D007) to Servicios Carbareon Inc. in January 1985. While Owens has been unable to locate any information or documents pertaining to this Hazardous Waste Manifest, it is likely that OIPR came to possess the rubble due to a glass melting furnace repair.

Request No. 11:

List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during the Company's operations at the Facility.

Response No. 11:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Notwithstanding the foregoing and without waiving any of its objections, Owens has been unable to locate any information or documents within its custody or control that may be responsive to this request, other than the information provided in the following Exhibits:

- Exhibit E: 12/19/1983 Owens' Response to USEPA Request for Information
- Exhibit F: 3/11/1997 USEPA's RCRA § 3007 Information Request
- Exhibit G: 5/20/1997 OIPR's Response to USEPA's 3/11/1997 RCRA § 3007 Information Request
- Exhibit H: 3/11/1997 USEPA's Request for Information Pursuant to Section 9005 of the Resource Conservation and Recovery Act (RCRA)
- Exhibit I: 5/20/1997 OIPR's Response to USEPA's 3/11/1997 RCRA §9005 Request for Information
- Exhibit J: 7/3/1997 USEPA's RCRA § 3007 Information Request #2
- Exhibit K: 8/11/1997 OIPR's Response to USEPA's RCRA § 3007 Request for Information

- Exhibit L:** 7/2/1997 USEPA's Request for Information Pursuant to Section 9005 of the Resource Conservation and Recovery Act (RCRA)
- Exhibit M:** 8/11/1997 OIPR's Response to USEPA's RCRA § 9005 Request for Information
- Exhibit N:** 10/28/1997 USEPA's RCRA § 3007 Information Request #3
- Exhibit O:** 12/1/1997 OIPR's Response to USEPA's RCRA § 3007 Information Request #3
- Exhibit P:** 10/28/1997 USEPA's Request for Information Pursuant to Section 9005 of the Resource Conservation and Recovery Act (RCRA) – Request #3
- Exhibit Q:** 12/1/1997 OIPR's Response to USEPA's RCRA § 9005 Request for Information
- Exhibit R:** 12/24/1997 OIPR's Response to RCRA § 3007 and § 9005 Requests for Information
- Exhibit S:** 1/5/1998 OIPR's Response to RCRA § 3007 Request for Information

Request No. 12:

List and fully describe all waste streams generated from the Company's operations, including solid, liquid, or any other type of waste.

Response No. 12:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 13:

Describe in detail the handling, storage, and disposal practices employed by the Company for each waste stream resulting from the Company's operations.

Response No. 13:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 14:

Identify all individuals who had responsibility for the Company's environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of the Company's hazardous substances, hazardous wastes, and industrial wastes).

- a. Provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.*
- b. Provide the nature of the information possessed by each such individual concerning the Company's waste management.*

Response No. 14:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 15:

For each type of hazardous substance, hazardous waste, and industrial waste used or generated by the Company, describe the Company's agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.

- a. Provide any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Company's Facility that came to be located at the Site.*
- b. Provide all correspondence and written communications between the Company and each owner/operator of the Site regarding the Company's hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.*

Response No. 15:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 16:

Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:

- a. The locations where the Company sent each type of hazardous substance, hazardous waste, and industrial waste for disposal, treatment, or recycling;*
- b. List all Waste Transporters used by the Company;*
- c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which Waste Transporter picked it up;*
- d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each Waste Transporter picked up such waste;*
- e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each Waste Transporter (per week, month, or year);*
- f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each Waste Transporter;*
- g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste;*
- h. Describe how the Company managed pickups of each hazardous substance, hazardous waste, and industrial waste including but not limited to:*
 - i. The method for inventorying each type of hazardous substance, hazardous waste, and industrial waste;*
 - ii. The method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up;*
 - iii. The identity of the Waste Transporter employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and*
 - iv. The amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;*
- i. Identify the individual or organization that selected the location where each of the Company's wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.*

Response No. 16:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its

objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 17:

If not already provided, specify the dates and circumstances when the Company's hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent, brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

Response No. 17:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 18:

Identify, describe, and provide all documents that refer or relate to the following:

- a. *The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by the Company (including the Facility) to any other facility;*
- b. *In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement;*
- c. *The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate whether the Company was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances;*
- d. *Other materials other than the hazardous substances that were involved in the transaction;*
- e. *The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment;*
- f. *The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment; and*
- g. *All tests, analyses, analytical results, and manifests concerning each hazardous*

substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).

Response No. 18:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 19:

Indicate how long the Company has had a relationship with the owner(s) and/or operator(s) of the Site.

Response No. 19:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 20:

Identify any individuals, including former and current employees, who may be knowledgeable of the Company's operations and practices concerning the handling, storage, and disposal of hazardous substances.

Response No. 20:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request, other than the information provided in response to Request No. 11.

Request No. 21:

Please provide all documents, if not already requested above, that support your responses to Requests #1 - #20, above.

Response No. 21:

See Attached Exhibits.

Request No. 22:

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. The Company's document retention policy between 1975 and 2018;*
- b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;*
- c. A description of the type of information that would have been contained in the documents;*
- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents; and*
- e. The names and most current address of any person(s) who may possess documents relevant to this inquiry.*

Response No. 22:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Notwithstanding the foregoing and without waiving any of its objections, Owens provides the following information:

See Exhibit T for Record Retention Policies from August 1985 to present.

Request No. 23:

Please provide copies of the Company's financial statements, shareholder's reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years.

Response No. 23:

See Response to Request No. 1.

Request No. 24:

List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its parent corporation(s), subsidiary, or subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at and from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been released or threatened to be released into the environment at or from the Facility.

Response No. 24:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request.

Request No. 25:

State whether any claim or claims have been made by the Company to any insurance company for any loss or damage related to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, claim number, date of claim, amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and recipient of any payment made on the claim.

Response No. 25:

In addition to the General Objections set forth above, Owens objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Owens has operations throughout the world; waste streams generated at facilities in locations other than Puerto Rico are not relevant to this response. Notwithstanding the foregoing, and without any waiver of its objections, Owens has located no information or document within its custody or control that may be responsive to this request.

Request No. 26:

If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response No. 26:

Notwithstanding the foregoing, and without any waiver of its objections, Owens has

located no other persons other than those identified in the response to Request No. 27, who may be able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents.

Request No. 27:

State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.

Response No. 27:

Personal knowledge:

Hector Negrón
Former OIPR employee
P.O. Box 387
Vega Alta, PR 00762

Milton Rosa
Former OIPR employee
Phone: 787-898-5000

David Irizarry
Former OIPR employee
Phone: 419-215-7608

Assisted with responses:

Suzanne Crawford
Litigation Administration Manager
Owens-Illinois, Inc.
One Michael Owens Way, Plaza One
Perrysburg, OH 43551

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

John F. Cayton

NAME (print or type)

Attorney

TITLE (print or type)

[Signature]

SIGNATURE



BRENDA CORR
NOTARY PUBLIC - OHIO
MY COMMISSION EXPIRES 07-02-2019

Sworn to before me this

3 day of June 2019.

Notary
Public

Brenda Corr